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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

ALFONSO LARA,

Defendant.

No. CR-11-0454-MAG

No. CR 11-00453-MAG

STIPULATED REQUEST TO CONTINUE  
HEARING DATE TO AUGUST 2, 2011  
AND TO EXCLUDE TIME UNDER THE  
SPEEDY TRIAL ACT AND ~~PROPOSED~~  
ORDER

UNITED STATES OF AMERICA,

Plaintiff,

v.

MARTHA LARA,

Defendant.

Hearing Date: July 28, 2011  
Time: 9:30 a.m.

The above-captioned matters are set on July 28, 2011 before this Court for a status hearing on detention, consent to magistrate jurisdiction, and further proceedings regarding U.S. Marshals processing. The parties jointly request that the Court continue the matter to August 2, 2011 at 3:00 p.m. for CHANGE OF PLEA AND SENTENCING, and that the Court exclude time under the Speedy Trial Act, 18 U.S.C. §§ 3161(h)(7)(A) and (B)(iv), between the date of

1 this stipulation and August 2, 2011.

2 Defense counsel for Martha Lara has a scheduling conflict on July 28 and defense  
3 counsel for both cases need additional time to review discovery and discuss the cases with their  
4 clients.

5 The parties further stipulate and agree that the ends of justice served by this continuance  
6 outweigh the best interest of the public and the defendants in a speedy trial. Accordingly, the  
7 parties agree that the period of time from the date of this Stipulation to August 2, 2011, should  
8 be excluded in accordance with the provisions of the Speedy Trial Act, 18 U.S.C. §§  
9 3161(h)(7)(A) and (B)(iv), for effective preparation of defense counsel, taking into account the  
10 exercise of due diligence.

11 /S/

12 DATED: July 27, 2011

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AVIVA GILBERT  
Law Clerk, United States Attorney's Office

15 /S/

16 DATED: July 27, 2011

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WADE RHYNE  
Assistant United States Attorney

18 /S/

19 DATED: July 27, 2011

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JOHN PAUL REICHMUTH  
Assistant Federal Public Defender  
Counsel for Alfonso Lara

22 /S/

23 DATED: July 27, 2011

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ERICK GUZMAN  
Counsel for Martha Lara

**ORDER**

Based on the reasons provided in the stipulation of the parties above, the Court hereby  
FINDS:

1. Given the defense need to review discovery;
2. Given that defense counsel has a scheduling conflict on July 28, 2011;
3. Given that the ends of justice served by this continuance outweigh the best  
interest of the public and the defendant in a speedy trial;

Based on these findings, IT IS HEREBY ORDERED that the STATUS date of July 28,  
2011, scheduled at 9:30 a.m., before the Honorable Donna M. Ryu, be vacated and reset for  
August 2, 2011, at 3:00 p.m. for CHANGE OF PLEA AND SENTENCING.

It is FURTHER ORDERED that time is excluded pursuant to the Speedy Trial Act, 18  
U.S.C. §§ 3161(h)(7)(A) and (B)(iv), from the date of this stipulation to August 2, 2011.

July 27, 2011



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HON. DONNA M. RYU  
United States Magistrate Judge